

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

SAMEER PAUL GADOLA,

Defendant.

INDICTMENT

_____/

The Grand Jury charges:

COUNT 1
(Enticement of a Minor)

On or about March 24, 2016, in Ingham County, in the Southern Division of the Western District of Michigan, the defendant,

SAMEER PAUL GADOLA,

did use a means and facility of interstate or foreign commerce to knowingly persuade, induce, and entice an individual who had not attained the age of 18 years to engage in sexual activity for which a person could be charged with a criminal offense.

Specifically, the defendant used Instagram, an internet-based social media platform, to persuade, induce, and entice J.L., a 16-year-old boy in Texas, to send images of himself engaged in sexually explicit conduct and the lascivious display of his pubic area.

18 U.S.C. § 2422(b)

18 U.S.C. § 2251(a)

COUNT 2

(Sexual Exploitation of a Minor)

On or about March 24, 2016, in Ingham County, in the Southern Division of the Western District of Michigan, the defendant,

SAMEER PAUL GADOLA,

did employ, use, persuade, induce, and entice a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct and the visual depiction was actually transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce.

Specifically, the defendant employed, used, persuaded, induced, and enticed J.L., a 16-year-old boy in Texas, to create an image depicting the lascivious exhibition of his genitals. The image was then transmitted to the defendant via Instagram, an internet-based social media platform.

18 U.S.C. § 2251(a)

18 U.S.C. § 2251(e)

18 U.S.C. § 2256(8)(A)

COUNT 3

(Receipt of Child Pornography)

On or about March 24, 2016, in Ingham County, in the Southern Division of the Western District of Michigan, and elsewhere, the defendant,

SAMEER PAUL GADOLA,

knowingly received child pornography that was shipped or transported using any means or facility of interstate or foreign commerce, including by computer. Specifically, the defendant received an image of child pornography through Instagram, an internet-based social media platform.

18 U.S.C. § 2252A(a)(2)(A) and (b)(1)

18 U.S.C. § 2256(8)(A)

FORFEITURE ALLEGATION
(Enticement of a Minor)

The allegations contained in Count 1 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 2428.

Pursuant to 18 U.S.C. § 2428, upon conviction of an offense in violation of 18 U.S.C. § 2422,

SAMEER PAUL GADOLA

shall forfeit to the United States any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of the offense and any property, real or personal, constituting or derived from any proceeds that the defendant obtained, directly or indirectly, as a result of the offense. The property to be forfeited includes, but is not limited to, the following:

- a. an Apple iPhone 6+, serial number F9CS5090G5QH, IMEI number 354454062053000;
- b. an Apple iPhone, IMEI number 990002778392066; and
- c. a Lenovo laptop computer, serial number YB05028657.

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

18 U.S.C. § 2428
28 U.S.C. § 2461(c)
21 U.S.C. § 853(p)
18 U.S.C. § 2422

FORFEITURE ALLEGATION

(Sexual Exploitation of a Minor;
Receipt of Child Pornography)

The allegations contained in Counts 2 and 3 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 2253.

Pursuant to 18 U.S.C. § 2253(a), upon conviction of an offense in violation of 18 U.S.C. §§ 2251 or 2252A,

SAMEER PAUL GADOLA

shall forfeit to the United States of America any visual depiction described in 18 U.S.C. §§ 2251 or 2252A; any matter which contains any such visual depiction that was produced, transported, mailed, shipped, or received in violation of Title 18, United States Code, Chapter 110; any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offenses; and any property, real or personal, used or intended to be used to commit or to promote the commission of the offenses and any property traceable to such property. The property to be forfeited, as to both counts, includes, but is not limited to, the following:

- a. an Apple iPhone 6+, serial number F9CS5090G5QH, IMEI number 354454062053000;
- b. an Apple iPhone, IMEI number 990002778392066; and
- c. a Lenovo laptop computer, serial number YB05028657.

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant

to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 2253(b) and by 28 U.S.C. § 2461(c).

18 U.S.C. § 2253(a), (b)

21 U.S.C. § 853(p)

28 U.S.C. § 2461(c)

18 U.S.C. § 2251

18 U.S.C. § 2252A

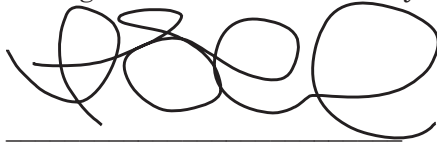
18 U.S.C. § 2256(8)(A)

A TRUE BILL

A handwritten signature in black ink, appearing to read "M. E. W.", followed by a horizontal line.

GRAND JURY FOREPERSON

ANDREW BYERLY BIRGE
Acting United States Attorney

A handwritten signature in black ink, appearing to read "A. Sanford", followed by a horizontal line.

ALEXIS M. SANFORD
Assistant United States Attorney